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*Special Counsel to Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ANNE SQUADRON, ANNE STRICKLAND
SQUADRON, SETH SQUADRON, ELIZABETH
SQUADRON, DANIEL SQUADRON, WILLIAM
SQUADRON, DEBRA LAGAPA, RICHARD
SQUADRON, THEODOSIA PRICE, DIANE
SQUADRON, THOMAS SHEA, PETER GOLD,
CAROL GOLD, SARAH D. GOLD, SWING
HARRE, DAVID HARRE, VANESSA N. GANG,
ANNA ROTHWELL, ROBERT VAS DIAS and
MARGARET BUTCHER,

Defendants.

Adv. Pro. No. 10-05164 (SMB)

NOTICE OF MEDIATOR SELECTION

On November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”)¹ [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 3141]. Pursuant to the Notice of Applicability filed by defendants Anne Squadron, Anne Strickland Squadron, Seth Squadron, Elizabeth Squadron, Daniel Squadron, William Squadron, Debra Lagapa, Richard Squadron, Theodosia Price, Diane Squadron, Thomas Shea, Peter Gold, Carol Gold, Sarah D. Gold, Swing Harre, David Harre, Vanessa N. Gang, Anna Rothwell, Robert Vas Dias, and Margaret Butcher (together, the “Defendants”), in this Adversary Proceeding on January 31, 2011 [Dkt. No. 5], the Order and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter.

Pursuant to the Avoidance Procedures, on April 29, 2014, Plaintiff Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), filed with this Court the Notice of Mediation Referral [Dkt. No. 35], wherein the Trustee and Defendants (the “Parties”) jointly agreed to enter mediation prior to or upon completion of discovery without further court order.

Through this Notice of Mediator Selection, and pursuant to the Avoidance Procedures and the Mediation Order, made applicable to the Parties upon the filing of the Notice of Mediation Referral, the Parties hereby mutually select from the Mediation Register Francis G.

¹ All terms not defined herein shall be given the meaning ascribed to them in the Order.

Conrad to act as Mediator in this matter. The Parties further agree to contact Francis G. Conrad as soon as practicable after this Notice of Mediator Selection is filed with the Court.

The Parties further agree that no person shall act as Mediator if that person, or that person's law firm, currently represents a party with respect to the BLMIS proceeding, unless the Parties provide prior written consent that the person may act as Mediator.

Pursuant to the Avoidance Procedures, the Parties agree that this mediation will conclude within 120 days from the date that this Notice of Mediator Selection is filed, unless that deadline is extended by mutual consent of the Parties and the Mediator.

Dated: New York, New York
May 21, 2014

By: /s/ Howard L. Simon
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